



STATE OF TENNESSEE
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
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January 7, 2015

Mr. Jason English, P.E.
Jacobs Engineering Group, Inc.
One Vantage Way, Suite B-400
Nashville, TN 37228

Re: Corrective Action Plan
Waverly Water Treatment Plant Wastewater Treatment System
Response to Compliance Evaluation Inspection
NPDES Permit # TN0078000

Dear Mr. English:

Thank you for submittal of a Corrective Action Plan (CAP), dated October 23, 2014, on behalf of the City of Waverly. The CAP was requested as a response to an inspection letter from our office dated March 26, 2014, regarding a Compliance Evaluation Inspection (CEI) conducted at the Waverly Water Treatment Plant on February 4, 2014.

The CEI letter required the following actions.

An engineering study should be prepared and engineering plans developed for measures to correct the lagoon leakage to meet the division's wastewater engineering design criteria (Chapter 9.4.1 Liners). This should include corrective measures for both lagoons. The engineering study and plans should also include actions to correct the cause of the filter backwash overflows. The engineering study report and engineering plans must be provided to the division for review, and approval received, prior to beginning any construction or modification activities. Structural stability of the lagoons and stabilization of eroded areas, and establishing adequate stormwater drainage around the lagoons, should be included in the plans. The city should work with their consulting engineer to correct these problems and to develop an operation and maintenance manual for the system.

Based on information provided by Mr. Gary Crowell, in a response letter dated April 24, 2014, and a telephone conversation on December 10, 2014, new operational procedures have been effective to eliminate the manhole overflows. The response letter also advised that an operation and maintenance manual for the system was being obtained from the engineering firm, and the other inspection items needing corrective action had been addressed.

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Division review of the CAP has been completed based on the requirements found in Chapter 9 of the Design Criteria (http://www.tn.gov/environment/water/water-quality_publications.shtml) and rule 0400-40-2 (<http://www.tn.gov/sos/rules/0400/0400-40/0400-40-02.20131216.pdf>).

The following items must be addressed to meet design criteria in order to allow the CAP to be approved.

1. Insure that the clay or synthetic membrane liner be extended up the sides of the lagoon dike walls above the maximum operational water level
2. Information establishing that any local clay to be used for the liner meets the requirements of Design Criteria Chapter 9.4.1.3
3. The addition to the plan of Design Criteria Chapter 9.4.1.4 Synthetic Membrane
4. The engineering plans must be signed and stamped by a professional engineer licensed to practice in the state of Tennessee per rule 0400-40-2.01

Please provide an amended copy of the CAP and engineering plans for division approval within 30 days of receipt of this letter.

The city's actions toward compliance and your prompt attention to these matters are appreciated. If you have any questions, please contact me by telephone at 615-687-7123 or by e-mail at Ann.Rochelle@tn.gov.

Sincerely,



Ann E. Rochelle
Division of Water Resources

Cc: Gary Crowell, Superintendent, City of Waverly